# EXHIBIT 6

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## IN THE HIGH COURT OF JUSTICE COMMERCIAL DIVISION (1) ACCRA – A.D. 2019

#### **SUIT NO. CM/RPC/0641/18**

FORTUNE GLOBAL SHIPPING & LOGISTICS LTD 15 FATAI IRAWO STREET AJAWO ESTATE, LAGOS STATE, NIGERIA

PLAINTIFF/RESP

#### **VRS**

1. THE VESSEL DLB SEA HORIZON

1ST DEF/APPLICANT

2. THE MASTER OF THE VESSEL DLB SEA HORIZON

**DEFENDANTS** 

3. THE OWNERS OF THE VESSEL DLB SEA HORIZON

- 4. CONSOLIDATED SHIPPING AGENCIES (CONSHIP) (AGENTS)
  PLOT NOS. 21/22 COMMERCIAL WATERHOUSE AREA, P. O. BOX CT 2491, ACCRA GHANA
- 5. RANGER SUBSEA NIGERIA LTD
  D93 LANDBRIDGE AVENUE, ONIRU ESTATE
  VICTORIA ISLAND, LAGOS STATE; NIGERIA
- 6. SUNTX CAPITAL TWO-LINCOLN CENTRE SUITE 1000 5420 LBJ FREEWAY DALLAS TEXAS 7520, USA
- 7. RANGER OFFSHORE USA INC 10370 RICHMOND AVENUE, SUITE 1000, HOUSTON TEXAS 77042, USA
- 8. RANGER INTERNATIONAL LTD 10370 RICHMOND AVENUE, SUITE 1000, HOUSTON TEXAS 77042, USA
- 9. TECHNIXS OIL FIELD SUPPORT LTD TECHNIXS BASE BESIDE NBTC, OVWIAN OFF WARRI ALADJA EXPRESSWAY, OVWIAN WARRI, DELTA STATE, NIGERIA
- 10. WAG SPV 1 5420 LBJ FREEWAY 1000, DALLAS, TEXAS, USA
- 11. RANGER INTERNATIONAL LIMITED
  AJELTAKE ROAD, AJELTAKE ISLANDS
  COMPANY COMPLEX, MARSHALL ISLANDS

### MOTION ON NOTICE FOR SECURITY FOR COSTS ORDER 24 RULE 1

MOTION ON NOTICE by Counsel for and on behalf of the 1<sup>st</sup> Defendant/Applicant praying this Honourable Court to order the Plaintiff/Respondent to provide security for costs as per the accompanying affidavit in support and for any further or other orders as to this Honourable Court may seem fit.

9.00 O'clock in the forenoon or soon thereafter as Counsel may be heard.

DATED AT D. K. AMELEY & ASSOCIATES, SUITE A1, 3<sup>RD</sup> FLOOR, TDC TOWERS, COMM. 2, TEMA, THIS 24<sup>TH</sup> DAY OF JANUARY, 2019.

D.K. AMELEY & ASSOCIATES SUITE AT 3° FLOOR TOC TOWERS COMMUNITY 2. TEN

SOLICITOR FOR 1ST DEFENDANT/APPLICANT

The Registrar High Court Commercial Division Accra

#### And To:

- 1. The Plaintiff or its Solicitor, Dr. Kofi Mbiah (Esq.), Alliance Partners, SSNIT Pension House, Tower Block (2<sup>nd</sup> & 4<sup>th</sup> Floor), Accra.
- 2. The 4<sup>th</sup> Defendant or their Solicitor, Esine Okudzeto Esq. Sam Okudzeto & Associates, Sena Chambers, 1<sup>st</sup> Floor, Total House, Liberia Road, Accra.

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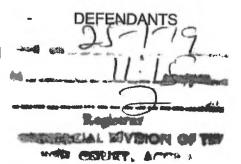
FORTUNE GLOBAL SHIPPING & LOGISTICS LTD ----15 FATAI IRAWO STREET
AJAWO ESTATE, LAGOS STATE, NIGERIA

PLAINTIFF/RESP

#### **VRS**

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- 2. THE MASTER OF THE VESSEL DLB SEA HORIZON
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  COMPANY COMPLEX, MARSHALL ISLANDS



#### **AFFIDAVIT IN SUPPORT**

- I, Daniel Kofi Ameley, Solicitor of Messrs D.K Ameley & Associates and of Suite A1 3<sup>rd</sup> Floor, TDC Towers, Community 2, Tema, make oath and say as follows: -
- That I am the Deponent herein.
- 2. That I am a Solicitor of Messrs. D. K. Ameley & Associates, and I have the authority of the 1<sup>st</sup> Defendant/Applicant vessel, to depose to this affidavit in support of matters within my personal knowledge.
- 3. That the Plaintiff/Respondent issued a Writ of of Summons against the 1<sup>st</sup> Defendant herein among others seeking reliefs as endorsed on the writ of summons and at the hearing of this application leave will be sought of this Honourable Court to refer to all processes so far filed in this suit.
- 4. That the 1<sup>st</sup> Defendant/Applicant among other Defendants have filed a Statement of Defence to the claim in essence denying in its entirety the claim made against the vessel.
- 5. That further to the issuing of the writ of summons, the Plaintiff/Respondent applied for the 1<sup>st</sup> Defendant vessel to be arrested and detained until the 1<sup>st</sup> Defendant provides security in the sum of four million US Dollars (US\$4,000,000.00) for its release.
- 6. That by the said arrest, the 1<sup>st</sup> Defendant/Applicant is losing about four million US Dollars (US\$4,000,000.00), among others, for loss of business.
- 6. That the Plaintiff/Respondent indicates by the Statement of Claim that it is a company registered in the Federal Republic of Nigeria and has its address as 15 FATAI IRAWO STREET, AFAWO EESTATE, LAGOS STATE, NIGERIA.
- 7. That the Plaintiff/Respondent is therefore not Ghanaian resident and indeed operates in Nigeria, outside the jurisdiction of this Honourable Court.
- 8. That I therefore apply that this Honourable Court orders the Plaintiff to pay 10% of the amount to be provided as security for costs, so that in the likely event of the Plaintiff losing the action, and costs are awarded, the 1<sup>st</sup> Defendant will be able to enforce the costs against the Plaintiff.

WHEREFORE I depose to this Affidavit in Support.

Sworn to at this Day of 2019

DEPONENT

Before me

COMMISSIONER FOR OATHS

JOHN AHETOL